EXHIBIT A

LAWYERS

A REGISTERED LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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April 17, 2007

VIA Email and U.S. Mail

Direct Dial (213) 229-7148 Fax No. (213) 229-6148 Client No. T 42376-00764

Mark Samuels, Esq. O'Melveny & Myers 1999 Ave of the Stars Ste 700 Los Angeles, CA 90067 Daniel A. Small, Esq. Cohen, Milstein, Hausfeld & Toll, P.L.L.C 1100 New York Avenue, N.W. Suite 500, West Tower Washington, D.C. 20005

Re: $AMD \ v. \ Intel - 30(b)(6) \ Deposition \ Notices \ and \ Related \ Document \ Requests$

Dear Mark and Dan:

Pursuant to the parties' discussions and the [Proposed] Order Modifying Order Re Intel's Evidence Preservation Issues, set forth in this letter are Intel's initial positions and concerns regarding sequencing, scope, and timing of the Notice of Taking Deposition of Intel Corporation and Intel Kabushiki Kaisha and For Production of Documents served by AMD on or about April 10, 2007 and the Class Plaintiffs parallel discovery served on or about April 11, 2007 (collectively the "Discovery Requests"). Intel's positions herein are not intended to constitute its full objections to the Discovery Requests and by not setting forth all of its objections herein, Intel does not intend to waive, nor does it waive, its objections. Rather, Intel provides this letter to permit the parties to identify any areas of discussion and determine the most efficient manner to approach the Discovery Requests. Intel reserves its right to provide formal objections and will do so at the appropriate time.

A. <u>Sequencing</u> of Discovery Requests:

The Discovery Requests address not only the scope of any evidence preservation issues and Intel's remediation plan, but also the causes of any such issues. As discussed at the Status Conference with the Special Master on March 7, 2007, the first issue the parties need to address is Intel's remediation plan. The Special Master's Order Re Intel's Evidence Preservation Issues, is consistent with this, as it indicates that the Discovery Requests would permit AMD and the Class Plaintiffs to assess Intel's plan of remediation. This is reinforced by the time frame set

Mark A. Samuels, Esq. Daniel A. Small, Esq. April 17, 2007 Page 2

forth in the Special Master's Order. It is not realistic to expect that the broad discovery set forth in Plaintiffs' requests could possibly be accomplished in the contemplated time frame. It is in the best interests of all parties that a remediation plan be proposed, evaluated, approved and implemented at the earliest possible opportunity, and not be delayed by discovery into other issues, which may become moot. Thus, any issues as to the causes of Intel's evidence preservation issues only need be addressed at a later time, if at all, as it is not until Intel executes its Remediation Plan that the parties can assess, what, if any, information will not be able to be recovered, and its relevance to the litigation.

As the proceedings to date indicate that the parties should focus first on the remediation of any evidentiary preservation issues, the Discovery Requests should be addressed in phases, where Phase One would be limited to topics concerning the facts identifying the scope of the evidence preservation issues and the steps Intel has taken or intends to take to remediate these issues. Thus, Phase One would be limited to the following: Deposition Topic Numbers 3, 5, 12, 13, 15, 17, 21, 22, 129, 30, and 31 and as modified, the following topics:

- As to Deposition Topic Number 4, during Phase One, this topic should be limited to the extent Intel's Remediation Plan addresses its current efforts to ensure information is not being deleted by any "auto-delete function," and the general application of the function. The remaining issues should await Phase Two.
- As to Deposition Topic Number 8, during Phase One, this topic should be limited to the extent Intel's Remediation Plan addresses its current efforts to ensure compliance with the Litigation Hold Notices issued in connection with this litigation. The remaining issues should await Phase Two.
- As to Deposition Topic Number 9, during Phase One, this topic should be limited to the facts identifying the extent to which any Custodian has not complied with the Litigation Hold Notices. The remaining issues should await Phase Two.
- As to Deposition Topic Number 14, during Phase One, this topic should be limited to the facts demonstrating when Intel migrated Custodians' email accounts to dedicated servers and to the extent Intel's Remediation Plan addresses its current efforts to migrate the data, the existence of records reflecting those migration efforts, and the specific dates of migration. The remaining issues should await Phase Two.

¹ This request should be limited to 2005 forward.

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Furthermore, Phase One should be limited to Document Request Numbers 2-4, 7, 9, 12-18, $23-26^2$, 28, 29, 35, and $43-46.^3$

Phase Two, to the extent Phase Two becomes necessary, would consist of Deposition Topic Numbers 1, 2, 6, 7, 10, 11, 16, 18-20, and 23-28, and Deposition Topics Number 4, 8, 9 and 14, to the extent not otherwise part of Phase One or not rendered moot and subject to Intel's objections. Moreover, the specifics of the following Document Requests, including objections or issues rendered moot by the remediation, would also be addressed during Phase Two: 1, 5, 6, 8, 10, 11, 19-22, 27, 30-34, and 36-42.

B. <u>Scope of the Discovery Requests:</u>

Beyond sequencing, the scope of various Discovery Requests is overbroad and raises various concerns regarding privilege. As an initial matter, Intel is committed to providing a full factual record as to its retention efforts. To that end, Intel intends to produce a complete record of Intel's internal processes in creating and implementing its retention plan, including communications between Intel's in-house counsel and its IT employees, subject to reaching an agreement on privilege. While we believe that some of this inside attorney material and communications may not be subject to a claim of attorney-client privilege, some inside counsel material and communications may properly be considered subject to attorney client privilege or entitled to work product protection.

This creates two levels of issues: (1) reviewing the large amount of material to determine what portions may constitute attorney client communications and/or attorney work product; and (2) then determining what material to produce or to redact. To avoid the prospect of extended proceedings on this side issue, Intel would like to reach a stipulation that will allow for a full production concerning Intel's retention efforts, but will not create the risk of broader waivers. In some instances, production of documents "sufficient to show" on an issue might allow all potentially privileged documents to be excluded. In other instances, however, producing "all" documents or even those "sufficient to show" will require production of documents that may at least arguably be protected by privilege or work product protection, and thereby potentially creating scope of waiver issues. To allow that production in a timely manner, Intel seeks agreement to the following:

² Intel believes Request Nos. 24 and 46 should be responded to on a "sufficient to show" basis.

³ This does not mean that Intel, after diligent search, will in fact have responsive documents for each category. In the collection process, there may also be issues concerning scope and interpretation that may need to be discussed and raised with Plaintiffs' counsel.

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- 1. Plaintiffs will agree that Intel's production shall not constitute a waiver of the attorney client privilege or work product protection (collectively, the "privilege") beyond any document produced, or as to other issues, whether or not related.
- 2. Plaintiffs will agree not to seek documents or disclosure of communications that constitute "core" work product of any attorney relating to Intel's defense of the underlying action, including, but not limited to, the process of selecting custodians.
- 3. Plaintiffs will agree that Intel shall not be required to produce documents or disclose communications to or from outside counsel, and that its production of documents or disclosure of communications on the topics described above shall not constitute a waiver of Intel's privilege with respect to Intel's outside counsel or counsel's work product protection. If Plaintiffs' believe that a specific and limited waiver of Intel's privilege with respect to outside counsel is essential in any specific issue regarding Intel's retention practices, Intel will consider in good faith agreeing to such a waiver, limited in scope as set forth in paragraphs 1 and 2 above.
- 4. In the event a dispute may arise concerning potential privilege from Intel's production, Intel or Plaintiffs may submit the dispute to the Special Master for resolution, reserving the right to appeal any decision to the Court.

In addition, the parties need to discuss the issue of privilege logs. Intel proposes a further discussion as to what, if any, privilege logs should be prepared. Given the time constraints on this process, at a minimum, the limitations previously agreed to should apply and the topic areas for a potential privilege log should be identified with specificity.

Finally, the scope of Intel's response to the Discovery Requests will not extend beyond this litigation. Thus, Discovery Requests aimed at other Intel litigation, governmental investigations or internal investigations are beyond the scope of this inquiry and would raise numerous privilege issues.

Phase One Deposition Topics and Document Requests:

Beyond the privilege concerns, which generally apply to all Deposition Topics and Document Requests, and "other litigation" issues discussed above, Intel has additional concerns with the following Phase One Deposition Topics for the following reasons:

• Deposition Topic Number 5: Intel is amenable to producing a witness concerning the timing, content and distribution of the litigation hold notice. As framed, however, it potentially invades the attorney client privilege with outside counsel, and Intel would object to that extent.

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- Deposition Topic Number 12: Intel is amenable to producing one or more
 witnesses to testify regarding the technical harvest instructions and protocols
 employed. To the extent Deposition Topic Number 12 is intended to encompass
 the reasons why Intel issued any instructions or employed certain protocols,
 however, this topic is overbroad.
- Deposition Topic Number 15: To the extent this topic is not limited to dedicated back-up servers containing Weekly Back-Up Tapes, this topic is overbroad. Accordingly, Intel seeks clarification on the type of information sought in this request.
- Deposition Topic Number 17: Intel is willing to produce one or more witnesses
 to testify to the identity of the Custodians whose information is preserved on
 Intel's Weekly Backup Tapes, the volume of information stored on those Tapes,
 and the file format of that information, or to provide a list of the information from
 the vendor. To the extent the word "content" as used in this discovery request
 seeks more information, Intel seeks clarification on the type of additional
 information sought.
- Deposition Topic Number 21: As with Deposition Topic Number 17, Intel is willing to produce one or more witnesses to testify regarding the operation, preservation, maintenance, restoration of, and Intel operational management responsibility for the Complaint Freeze Tapes. Again, to the extent the word "content" as used in this discovery request seeks more information, Intel seeks clarification on the type of additional information sought.
- Deposition Topic Number 22: Intel believes that this deposition topic is overbroad as to time and that the scope of Intel's response to this discovery request should be limited to 2005 forward.
- Deposition Topic Number 30: Because the parties' Custodian Stipulation contemplates that the parties would not seek to preserve data of all "electronic data relevant to this litigation," this topic is overbroad to the extent it seeks information beyond that contemplated by the Custodian Stipulation.

As a general matter, Phase One Document Requests, where the requests seek "all documents" "evidencing or pertaining to," "relating to," "concerning," "referring . . . to," "discussing," or "evidencing [or reflecting] communications regarding" a topic, extend beyond evidentiary preservation and remediation issues and therefore should be limited. Intel intends to identify that primary group of individuals it has determined were materially involved in the issues raised by Plaintiffs' discovery requests, search those custodians to the extent not already

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done, and produce the responsive documents from June 2005 to the present consistent with the scope identified in the request, i.e., in some instances "sufficient to show" as opposed to "all." In addition to this general overbreadth issue, privilege, and "other litigation" concerns raised above, Intel also has specific concerns with the following Phase One Document Requests for the following reasons:

- Document Request Number 7: Intel is amenable to producing documents sufficient to show the timing, content, distribution and identity of Litigation Hold Notices to Intel Custodians in connection with this litigation.
- Document Request Number 17: Intel is willing to produce documents sufficient to show the promised functionality of the "archive system," the date of procurement, any request for proposal by Intel and request for proposal response by EMC, and any contracts between Intel and EMC relating thereto, after proper notice to EMC and addressing any confidentiality concerns of EMC.
- Document Request Number 24: Intel is willing to produce documents sufficient to show the instructions to Intel's IT group pertaining to the creation, preservation and cataloguing of Weekly Backup Tapes.
- Document Request Number 26: Intel is willing to produce documents sufficient to explain the recycling of Weekly Backup Tapes by Europe Intel's IT department.
- Document Request Number 29: Intel is willing to provide an inventory of all Complaint Freeze Tapes containing Intel Custodian data, including which Custodian data is on which tape.
- Document Request Numbers 43 and 44: In light of the privilege concerns articulated above, Intel believes these requests are overbroad. Intel is willing, of course, to produce non-privileged documents cited or referred to in its Remediation Plan.
- Document Request Number 45: Because the parties' Custodian Stipulation contemplates that the parties would not seek to preserve data of all "electronic data relevant to this litigation," this document request is overbroad to the extent it seeks information beyond that contemplated by the Custodian Stipulation.

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Phase Two Deposition Topics And Document Requests:

In addition to the privilege concerns, which generally apply to all depositions and document requests, and "other litigation" issues discussed above, all Phase Two Deposition Topics and Document Requests are beyond the initial scope of discovery. The scope of potential relevance of Phase Two discovery cannot be determined with certainty until the remediation plan is approved, implemented and tested. Intel also has specific concerns with the following Phase Two Deposition Topics for the following reasons:

- Deposition Topic Number 14: This topic should be limited to the facts demonstrating when Intel migrated Custodians' email accounts to dedicated servers and to the extent Intel's Remediation Plan addresses its current efforts to migrate the data, the existence of records reflecting those migration efforts, and the specific dates of migration. To the extent this discovery request, including but not limited its use of the phrase "nature . . . of Intel's efforts," is intended to capture more information, it is overbroad.
- Deposition Topic Number 26: This topic should be limited to the contemporaneous facts underlying the representations made by Mr. Rosenthal in his October 14, 2005 letter to AMD concerning Intel's evidence preservation.

As a general matter, Phase Two Document Requests, where the requests seek "all documents" "evidencing or pertaining to," "relating to," "concerning," "referring . . . to," "discussing," or "evidencing [or reflecting] communications regarding" a topic, are overbroad and therefore should be limited. In addition to this general overbreadth issue, privilege and the "other litigation" issues raised above, and the general relevance of Phase Two Document Requests at this time, Intel also has concerns with the following Phase Two Document Requests for the following reasons:

- Document Request Number 1: Intel is amenable to producing documents sufficient to show the evidence preservation and policies applied to this litigation.
- Document Request Number 6: Intel is amenable to producing documents that constitute communications by Intel to any Intel Custodian informing them that if they did not act affirmatively to preserve their email and/or other electronic data, it would be automatically deleted pursuant to an "auto-delete" function. As currently phrased, however, this document request is overbroad and should be narrowed, if and when Phase Two becomes necessary.

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- Document Request Number 11: Intel is willing to produce documents sufficient
 to show Intel's discovery of the interpretation by Intel Custodians of the
 Litigation Hold Notices issued by Intel in connection with this Litigation. As
 phrased, this document request is overbroad and should be narrowed, if and when
 Phase Two becomes necessary.
- Document Request Number 19: As phrased, this document request is overbroad and should be narrowed, if and when Phase Two becomes necessary.
- Document Request Numbers 20 and 21: Intel is amenable to producing documents sufficient to show which Intel Custodians were identified to be migrated but who were inadvertently not migrated to dedicated servers in Fall 2005 and which Intel Custodians who were later identified and were not migrated upon such identification. As phrased, these document requests are overbroad and should be narrowed, if and when Phase Two becomes necessary.
- Document Request Number 27: Intel believes that this document request is
 overbroad as to time and that the scope of Intel's response to this discovery
 request should be limited to 2005 forward, if and when Phase Two becomes
 necessary. Intel further believes that the scope of the request is overbroad to the
 extent it is not limited to backup systems that would hold Exchange data of Intel
 Custodians.
- Document Request Number 30: Intel is willing to produce documents sufficient to show any actual or suspected loss or recycling of Complaint Freeze Tapes. As phrased, this document request is overbroad and should be narrowed if and when Phase Two becomes necessary.
- Document Request Numbers 31, 32, and 33: As phrased, these document requests are overbroad and should be narrowed, if and when Phase Two becomes necessary.
- Document Request Number 34: Intel is prepared to produce summaries of any failure of any Intel Custodian to comply fully with a Litigation Hold Notice or retention instruction. Yet, as phrased, this document request is overbroad and should be narrowed, if and when Phase Two becomes necessary.
- Document Request Number 36: Intel is willing to produce documents sufficient
 to show any failure or suspected failure to preserve the data of such Intel
 Custodians. As phrased, this document request is overbroad and should be
 narrowed, if and when Phase Two becomes necessary.

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- Document Request Numbers 37-40. These are "sufficient to show" requests, but on their face seek to invade the attorney client privilege with outside counsel.
 Intel is willing to discuss narrowing the requests to address the issues of when Intel discovered relevant facts.
- Document Request Number 41: Intel is willing to produce documents sufficient to show the timing of said investigation. The Special Master and the parties are familiar with its nature and purpose.
- Document Request Number 42. Intel is willing to address in discovery the timing and means by which Intel discovered the misunderstanding of certain custodians concerning the retention procedures put in place by Intel's IT group.

C. <u>Timing of the 30(b)(6) Depositions and Document Production</u>

Intel proposes that it continues its investigation into the documents responsive to the above-referenced requests and inform you on April 30, 2007 of the expected date of production, provided that the parties can reach a prompt agreement as to the scope of any privilege waiver, as well as a proposed date for the Rule 30(b)(6) deposition. Intel will meet and confer with AMD and Class Plaintiffs to determine the timing as to the Phase Two topics, to the extent Phase Two becomes necessary.

Of course, we are prepared to discuss our initial position with you and respond to any questions you may have.

Very truly yours,

Danal Flace

Daniel S. Floyd

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EXHIBIT B

LAWYERS

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August 3, 2007

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VIA EMAIL

James (Bo) M. Pearl O'Melveny & Myers LLP 1999 Avenue of the Stars Los Angeles, CA 90067-6035

Re: AMD v. Intel

Dear Bo:

Set forth below are the written summaries that Intel agreed to provide pursuant to paragraph 4 of the Remediation Stipulation signed by the parties on July 5, 2007. These summaries contain the information sought by AMD's Remediation Document Request Nos. 5, 8, and 13. Most of this information already has been provided over the course of the last few weeks in letters, documents produced and deposition. However, pursuant to your request last Thursday that the summaries be set forth in a letter response, I am providing the information below.

REQUEST NO. 5:

Documents sufficient to fully show and evidence the identity of those persons involved in designing, developing, preparing, proposing or considering remediation options, alternatives, suggestions or proposals.

WRITTEN SUMMARY RE REQUEST NO. 5:

On June 26, 2007, in a letter from Robert Cooper to Mark Samuels and Brent Landau, Intel provided its written summary of the information sought by Request No. 5. For your reference I have attached, as Exhibit A, a copy of the June 26 letter. In addition, Malcolm Harkins provided testimony in his 30(b)(6) deposition on this issue on June 29, 2007.

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REQUEST NO. 8:

Documents sufficient to fully show or evidence the costs of each specific component of Intel's Remediation Plan, including specifically and without limitation, the costs of suspending the email "auto-delete" function, costs of migrating Intel employees' mailboxes to "a set of consolidated Exchange servers ("Storage Group 3" or "SG3" servers)," costs of acquiring and implementing the EMC e-mail archiving system or "the Archive," costs of restoring the "Complaint Freeze Tapes" and the "Weekly Backup Tapes," and any other remediation-related cost Intel believes or contends is material.

WRITTEN SUMMARY RE REQUEST NO. 8:

Set forth below is a detailed breakdown of the costs of the specific components of Intel's Remediation Plan.

Costs associated with processing and restoring the complaint freeze tapes and weekly backup tapes:

- o Intel has incurred approximately \$2,628,128 in expenses through mid-July 2007 for services rendered by First Advantage for processing and restoring complaint freeze tapes and weekly backup tapes in connection with the Remediation Plan. Intel expects that it will incur an additional amount of approximately \$225,000.00 for work to be performed by First Advantage in completing the restoration of the e-mails from the complaint freeze tapes and weekly back-up tapes for the remaining 1023 custodians.
- Intel has incurred approximately \$1,347,840 in expenses through mid-July 2007 for services rendered by Onsite for processing complaint freeze tapes and weekly backup tapes in connection with the Remediation Plan.

Costs associated with creation of the global database:

- O Intel has incurred approximately \$5,089,658 in processing fees through the end of July 2007 for services rendered by EED in loading custodial data from the complaint freeze tapes, weekly backup tapes, harvest 1 data and harvest 2 data into the global database.
- O Intel expects that it will incur an additional amount of approximately \$3,000,000 to \$6,000,000.00, or more, to load the remaining custodian data into the global database. This is an estimate only and could change depending on the final volume count of custodial data.

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- o Intel expects that it may incur additional expenses for loading email data from "functionally equivalent custodian substitutes" as described in Intel's Report and Proposed Remediation Plan, but does not have a specific estimate of the amount at this point in time.
- o Intel expects that it will also incur additional expenses to de-duplicate the remedial materials against the harvest 1 materials, but does not have a specific estimate of the amount at this point in time.

Consulting charges and expert witness fees:

- o Intel has incurred approximately \$307,750 in consulting fees through the end of June 2007 for services provided by EED in connection with creating and loading the global database, data remediation and preservation validation.
- Intel has incurred approximately \$82,625 in analyst fees through the end of June 2007 for services provided by EED.
- Intel has incurred approximately \$43,225 in fees through the end of June 2007 for services rendered by John Jessen of EED in connection with Intel's Remediation Plan.
- o Intel expects that it will incur significant additional expenses for consulting and expert work to be performed by EED in connection with the Remediation Plan, but does not have a specific estimate of the amount at this point in time.

Costs associated with 2007 harvest:

- O Intel has incurred approximately \$2,225,000 in fees for services provided by Perkins Coie in connection with their work in the harvesting of custodian data in 2007.
- o Intel has incurred over \$650,000 in travel expenses for the personnel from Perkins Coie and Intel involved in harvesting custodian data in 2007.
- o Intel has incurred approximately \$450,000 to \$500,000 in internal costs based on the man-hours worked by Intel paralegals, IT personnel and support staff in connection with the harvesting of custodian data in 2007.
- Intel has incurred approximately \$1,100,000 in connection with remote harvesting software. Some of the amount incurred was for a software license and some was for consulting time.

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- o Intel has incurred approximately \$37,329 to purchase hard drives to use for the collection of harvested materials in 2007.
- o In order to accommodate the retention of re-harvested electronic documents, Intel is using SAN space allocation. The cost associated with using this SAN space allocation is approximately \$1.2 million.

Costs associated with the collection of Group A and Group B tapes:

o Intel has incurred an estimated amount of approximately \$415,000 in fees and expenses for services provided by Perkins Coie to collect the complaint freeze tapes and weekly backup tapes.

Costs associated with e-mail archiving system:

- o Intel has incurred over \$1,100,000 million in connection with an e-mail archiving system (the "Archive"), which is composed of several inter-related components. The costs include a combination of the purchase price of the Archive software and hardware, consulting fees and expenses to purchase journaling servers for the Archive. The Archive was not purchased specifically for the Remediation Plan and is not used solely for the antitrust matters brought by AMD and Class counsel (the "Antitrust Litigation"). However, Intel is now using the Archive for preservation purposes in the Antitrust Litigation and committed to do so in its Remediation Plan. Intel estimates that approximately one third to one half of the expenses associated with the e-mail archiving system are allocable to the Antitrust Litigation.
- o Intel has incurred approximately \$55,000 to upgrade the journaling servers, which was necessitated by the suspension of auto-delete in March 2007 for the currently employed Intel personnel on the Custodian List, and others. Intel expects that it will need to upgrade the servers again in several months to a year if auto-delete remains suspended. (In that regard, employees are experiencing difficulties due to the increased mailbox sizes resulting from the suspension of auto-delete.)
- O Intel has incurred approximately \$300,000 to \$350,000 in costs for the time of Intel's IT personnel working on the journaling/Archive system.

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Attorney fees:

o In addition to the amounts listed above, Intel has incurred significant attorneys' fees in connection with its Remediation Plan.

REQUEST NO. 13:

Documents sufficient to fully show and evidence Intel's data harvest instructions, protocols and electronic harvesting tools employed; the type of data extracted or harvested; the identity of those individuals principally responsible for developing and executing such instructions, protocols and data harvesting; and Intel's efforts, if any, to preserve hard drives post-harvest.

WRITTEN SUMMARY RE REQUEST NO. 13:

As part of its Remediation Plan, in 2007 Intel has been engaged in the process of harvesting and re-harvesting electronic documents of currently employed custodians on Intel's Custodian List ("Harvest 2"). This includes re-harvests from those custodians who were previously harvested, and harvests from all remaining custodians not previously harvested. The materials of approximately 882 custodians, located in 43 different countries on six different continents, and 22 states within the United States, are being collected during the Harvest 2 process. The harvesting is being performed by a team of approximately 60 lawyers and paralegals from the law firm of Perkins Coie, a team of approximately 14 paralegals and litigation support personnel from Intel, a team of approximately 15-20 IT personnel from Intel, and representatives from the vendor Guidance (from whom Intel purchased the software tool Encase for remote harvesting). In addition, there were approximately 20 Intel and Perkins Coie personnel involved in administrative aspects of the Harvest 2, including scheduling issues, coordination issues, and making travel arrangements.

The materials for the majority of custodians are being harvested through an in-person process that involves a legal representative from Perkins Coie or Intel meeting with the custodian, conducting an interview with the custodian and then physically copying electronic data from the custodian's laptop or desktop onto a separate hard drive for collection purposes, and collecting other materials where appropriate ("In Person Collection"). The materials for some of the custodians are being collected remotely through the use of the Encase software ("Remote Collection"). The types of files collected in both the In-Person Collection and the Remote Collection are those with the following 36 file extensions: .bak, .csv, .doc, .dot, .gz, .htm, .html, .mdb, .mpp, .msg, .nsf, .obd, .oft, .ost, .pdf, .pps, .ppt, .pst, .pub, .rar, .rtf, .sea, .sit, .tar, .tif, .txt, .vsd, .wbk, .wkl, .wks, .wpd, .wps, .xls, .xlw, .xml and .zip. To date, Intel has harvested over 7.93 terabytes of data from the custodians during Harvest 2, of which 4.45 terabytes are e-mail data alone.

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The lawyers, paralegals and litigation support personnel tasked with responsibility for the In-Person Collection were provided with training, which was offered at multiple sessions. The first training session was conducted by Michael Lawrence, an Intel antitrust lawyer, Jeff Siebert, an Intel IT liaison in the Litigation Department, Sherry Truelove, an Intel paralegal and Steve Watson, Intel's ITERP Senior Incident Commander. The second training session was conducted by Michael Lawrence, Steve Watson, Silvio Estrada, Senior Intel IT Support Specialist, and Kelly Kelly, an Intel paralegal. Other individualized or small group training sessions were provided subsequently and were conducted by individuals who had previously been trained. Each search team member attended at least one of the offered training sessions. The written training materials were prepared under the direction of Emilynne De Vera, Director of Operations for the Litigation and Competition Group at Intel with input from Intel's IT Department and John Rosenthal of Howrey LLP. These training materials were produced to AMD on July 20, 2007 and bear the batestamp numbers 68608DOC0000001-69.

The Remote Collection is being conducted by a combination of Intel IT personnel (including Dave Pistone, Steve Watson, Star Hauff, Bill Breen, Tim Muchow, Michael Sparks, Tom Weisser, Neil Doran and others) and representatives from Guidance (including Phil Cooper and Joseph Murin). During the initial phase of the Remote Collection, Intel IT personnel ran the software tool for the remote harvesting, Encase, with instruction and assistance from Guidance representatives. For a period of time subsequently, representatives from Guidance ran the software tool for the Remote Collection under the direction of the Intel IT and Litigation Departments. Guidance representatives conducted a formal training session for Intel IT personnel during the week of June 25, 2007, after which Intel IT personnel assumed full control for running the Encase software tool to perform the Remote Collection.

A computer script was used during both the In-Person Collection and Remote Collection to copy all files with the 36 file extensions referenced above. The primary script used was prepared by Jeff Siebert, and was reviewed and approved by EED. In addition to the primary script, Jeff Siebert prepared a backup script to be run in instances where the primary script hung after multiple tries to copy specific files. EED recently discovered that there was an error in the backup script, which was the result of a typographical error in the program. That error has been corrected and Intel, Perkins and EED are working to ascertain which custodians, if any, may need to be re-harvested to make sure the appropriate files have been collected.

More detailed information concerning the Harvest 2 process is contained in the 30(b)(6) testimony provided by Malcolm Harkins during his deposition on June 29, 2007. (In connection with Mr. Harkins' review and signing of the deposition transcript, Intel intends to provide some clarifications and corrections to the transcript by August 15.) In addition, more detailed information concerning the Harvest 2 process is contained in the harvest related materials produced to AMD on July 27, 2007 from the files of David Pistone.

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Intel reserves the right to update and supplement the information provided in these written summaries.

Sincerely/

Kay E. Kochenderfer

KEK/kek

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June 26, 2007



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Brent W. Landau Cohen, Milstein, Hausfeld & Toll, P.L.L.C. One South Broad Street, Suite 1850 Philadelphia, PA 19107

Re: AMD v. Intel; Remediation Plan

Dear Counsel:

We spent a great deal of time last Friday discussing how to provide meaningful information to enable plaintiffs to comment on Intel's Remediation Plan, and while we made considerable progress, it seemed apparent to us that we were going around in circles on one issue in particular – specifically your desire for production of documents that discuss how the plan was chosen and what ideas were discussed and rejected in doing so. This letter is an effort on our part to clarify in a bit more detail what we explained during that meeting.

First, this will confirm, as we discussed, that Intel's Remediation Plan was designed by legal counsel for Intel. You asked if anyone other than counsel formulated the plan, and the answer is no. However, John Jessen of Electronic Evidence Discovery (EED) was consulted before we submitted the plan to the Special Master.

As we also explained, the Remediation Plan is being implemented and executed with the assistance of four outside consultants/vendors – First Advantage, OnSite, EED, and EMC.

We explained that Intel's IT Department did not play a role in the design of the plan. However, I believe we have made it clear that Intel's IT Department has been involved with certain aspects of the Remediation Plan, such as providing technical assistance with the 2007

LOS ANGELES NEW YORK WASHINGTON, D.C. SAN FRANCISCO PALO ALTO LONDON PARIS MUNICH BRUSSELS ORANGE COUNTY CENTURY CITY DALLAS DENVER

Mark A. Samuels June 26, 2007 Page 2

harvesting of custodians' electronic files and preparation of an updated policy regarding the handling of hard drives of departing employees. In addition, Intel's IT Department was involved with the implementation of the EMC e-mail archiving system and has continuing involvement in the monitoring of that system. Moreover, although Intel's IT Department was not involved in the decision-making process as to what data sources to include in the global database referenced in the Remediation Plan, the department did provide information to Intel's outside counsel and consultants/vendors about Intel's e-mail system and back-up tape processes to facilitate the remediation work.

To be more specific, Intel's legal counsel who participated in formulation of the Remediation Plan were:

- 1. Intel Corporation: Steven Rodgers, Jo S. Levy.
- 2. Bingham McCutchen: James Hunt.
- 3. Gibson, Dunn & Crutcher: Bob Cooper, Dan Floyd, Kay Kochenderfer.
- 4. Howrey: John Rosenthal, Darren Bernhard, Tom Dillickrath.
- 5. Weil Gotshal: David Lender.
- 6. Perkins Coie: Joel Nomkin, Anthony Marks.

In addition, Perkins Coie assisted Intel counsel and paralegals in execution of aspects of the Plan, specifically collection of back-up tapes and harvesting of custodians' electronic files (as well as other files).

Intel's outside consultants/vendors who are involved in execution and implementation of the plan include:

- 1. First Advantage: Adam Pollitt, Chris Racich, David Guido, David Greetham.
- 2. OnSite: Jeff Fehrman, Bob Krantz, Dave Shedd.
- 3. EED: John Jessen, Brandon Leatha.
- 4. EMC: Sam Thomas, Richard Guilleys, Jeff Barber.

The governing principle underlying the Remediation Plan (which was set forth in Intel's Remediation Report of April 23, 2007) was to collect and restore available sources of custodian electronic emails, including the complaint freeze tapes, weekly back-up tapes, and custodian harvests conducted post March 1, 2007 (in many cases a second harvest), all to be employed as additional sources of data to supplement production for Intel custodians selected by Intel or AMD and class counsel.

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We understand that plaintiffs assume that Intel or its counsel have documents that describe the formulation of the Remediation Plan, including discussions of alternative plans that were discussed and rejected. We have explained, however, that the discussions and any related documents about formulation of the Remediation Plan, whether among counsel (inside and outside counsel), or between outside counsel and Intel are classic examples of materials and discussions subject to either the attorney client privilege or core work product doctrine. Intel considers the work of counsel in this regard as no different than the work of counsel in defending the litigation in chief, and will not place its lawyers in a position of waiving that privilege and subjecting counsel to discovery and potentially becoming witnesses in the case.

Part of our difficulty with plaintiffs' position is that we do not understand how the production of anything that might have been considered by counsel in formulating the remediation plan, but not adopted, advances the ball, particularly when Intel has chosen to use all of the complaint freeze tapes, weekly back-up tapes and harvests to supplement custodian production. We do not know of any feasible alternatives to the Remediation Plan that would be more expansive. But as we have informed you, we are prepared to consider any additional steps that you think might be taken to further the remediation effort, and to that end are prepared to describe as fully as we can the steps we are taking.

That was our purpose in the meeting last Wednesday – to informally provide plaintiffs with detailed information about the steps First Advantage and OnSite have been taking to restore electronic email data from back-up tapes and harvests, and we are prepared to give plaintiffs access to the results of the work being performed by those consultants, as well as documents relating to their instructions from counsel, subject only to an agreement that supplying such material, which might be considered non-core work product, shall not constitute a broader waiver. We are also prepared to do the same with respect to EED. And we are prepared to answer any questions plaintiffs may have about the mechanics and processes of Intel's IT systems that may aid you in assessing the steps being taken in remediation.

I hope this further information is helpful and will provide a basis for going forward and completing meaningful discovery regarding Intel's Remediation Plan.

Very truly yours,

Robert E. Cooper

REC/lsj

cc: Daniel A. Small
Michael P. Lehman

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EXHIBIT C

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

ADVANCED MICRO DEVICES, INC., a Delaware corporation, and AMD INTERNATIONAL SALES & SERVICES, LTD., a Delaware corporation,)) Civil Action No. 05-441-JJF)
Plaintiffs,)
vs.)
INTEL CORPORATION, a Delaware corporation, and INTEL KABUSHIKI KAISHA, a Japanese corporation)))
Defendants.)

CUSTODIAN DESIGNATIONS OF INTEL CORPORATION AND INTEL KABUSHIKI KAISHA PURSUANT TO THE STIPULATION AND ORDER REGARDING DOCUMENT PRODUCTION

Defendants INTEL CORPORATION and INTEL KABUSHIKI KAISHA (collectively, "Intel"), attach hereto their Custodian List pursuant to the Stipulation and Order Regarding Document Production, dated May 15, 2006 and entered by the Court on May 17, 2006 ("Stipulation").

After reasonable investigation, Intel hereby represents that the individuals listed in Exhibit A, attached hereto, are believed to comprise all of its and its subsidiaries' personnel in possession of an appreciable quantity of non-privileged, material, non-duplicative documents and things responsive to Request Nos. 1-255 of AMD's Initial Document Requests in the custody of individual custodians (as opposed to corporate or organization-level requests or shared files or databases). This Custodian List includes any former employee as to whom Intel or its subsidiaries have retained responsive documents and things. Intel hereby commits to promptly supplement this Custodian List upon discovery of any additional custodians who have been omitted from this Custodian List. Intel further represents that it has not knowingly excluded from its Custodian List any person known or believed to possess documents harmful to its claims or defenses in this case.

Furthermore, pursuant to Paragraph 2 of the parties' Stipulation, Intel has identified its "Party-

Designated Production Custodians" with an asterisk (*) on the attached Custodian List.

OF COUNSEL:

Robert E. Cooper, Esq. Daniel S. Floyd, Esq. Gibson, Dunn & Crutcher LLP 333 South Grand Avenue Los Angeles, CA 900071 (213) 229-7000

Peter E. Moll, Esq. Darren B. Bernhard Howrey LLP 1299 Pennsylvania Avenue N.W. Washington, DC 20004 (202) 783-0800

Dated: June 1, 2006

POTTER ANDERSON & CORROON LLP

By: /s/ Richard L. Horwitz
Richard L. Horwitz (#2246)
W. Harding Drane, Jr. (#1023)
Hercules Plaza, 6th Floor
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899-0951
(302) 984-6000
rhorwitz@potteranderson.com
wdrane@potteranderson.corn

Attorneys for Defendants
Intel Corporation and Intel Kabushiki Kaisha

EXHIBIT A

INTEL'S CUSTODIAN LIST

1)	Aarsoe,	Ander
-,	2 2 2 2 3 3 3 4 5	IXIIUCI

Business Development Manager - Nordic Organization

2) Aboul-saoud, Khaldoun

Market Development Manager – Gulf Council Countries

3) Abud-Baki, Ramzi

Account Manager

4) Adams, Jeff*

Channel Division Planning Manager, Channel Supply and Demand Operations - Microprocessor Marketing and Business Planning

5) Adano, Robert*

District Manager, Acer – EMEA Sales and Marketing Group

6) Adwiarto, Singgih M.

Area Sales Manager, Indonesia – APAC Reseller Channel Operation

7) Aertebjerg, Joachim

Market Development Manager, Nordics - Dell Team Worldwide

8) Agatstein, L. Wilton*

Vice President - Channel Platforms Group General Manager - Emerging Markets Platform Group

9) Aglert, Nicklas

Retail Marketing Manager - Nordic Organization

10) Ahmadie, Maan

Channel Sales Manager, Dubai - EMEA Reseller Channel Operation

11) Ahn, Clint

Field Sales Engineer, Korea TriGem

12) Aillerie, Yves

Business Development Manager, Retail/Market Development Manager BULL - France Sales and Marketing Group

13) Ailt. Monica

Senior Attorney, Legal Team Lead - Sales and Marketing Group, Latin America Region

14) Akahane, Hisanori

Retail Marketing Manager - IJKK Solutions & Business Development Group

15) Akaike, Kunio

Channel Field Sales Engineer - IJKK Sales Team, 6th Sales Region

16) Akiyama, Izumi

Consumer Business Advertising Manager - IJKK Corporate Marketing Group

17)	Alabiso, Luisa
	Business Development Manager

18) Albarran, Antonino Solutions Specialist, Iberia Region

19) Alfanney, Firas Field Channel Marketing Manager – META Reseller Channel Operation Management Team

20) Alkaram, Amir Country Marketing Manager, Iraq – Influencer Sales

21) Alkoraishi, Mark United States Program Manager – Worldwide Sony and Program Office

22) Allen, David W.* Distribution Sales Manager – Reseller Channel Operation

23) Allen, Mark Senior Product Marketing Analyst – Product Marketing and Business Organization

24) Alquist, Eric CBO Channel – America's Sales and Marketing Operations

25) Al-Schamma, Sam GCC CM – META

26) Alt, Sharon* Director, EMS

27) Alvarez, Iris Customer Business Analyst – Dell Team Worldwide

28) Anderson, Caitlin* Business Operations – Hewlett-Packard Account Team

29) Anderson, Robert Senior Hardware Design Engineer

30) Andrade, Ana Field Sales Engineer, Mexico DF Channel

31) Andrietti, Bernadette Country Manager, France

Ang, Marge U.S. Strategic Relations Manager – Worldwide Sony Sales and Program Office

33) Antone, John* Vice President – Sales and Marketing Group; General Manager – Asia Pacific Region

34) Araki, Daisuke Field Sales Engineer, Enterprise Server and Workstation – IJKK Sales Team, 1st Sales Region

Arnold, Jason Channel Field Sales Engineer, Strategic Pricing Team – America's Sales & Marketing Operations

^(*) Denotes "Party-Designated Production Custodian"

36)	Arora, Ratika
	Field Sales Engineer

37) Arora, Surendra

Regional Sales Manager, South Asia – Customer Solutions Group, APAC Sales and Marketing

38) Arvizu, Aaron*

Field Sales Engineer, Mobile – Hewlett-Packard Account Team

39) Asami, Yuichi

Field Sales Engineer, Notebook – IJKK Sales Team, 1st Sales Region

40) Asano, Tomochika

Former Field Sales Engineer - IJKK Sales Team, 1st Sales Region

41) Ashby, Steve

Commercial Sector - Solutions Marketing, Americas Marketing Group

42) Athanasias, Nikos

Channel Field Sales Engineer, Israel/Greece/Cyprus

43) Baba, Mihaly

Channel Field Sales Engineer, Budapest

44) Baba, Takashi

Field Sales Engineer, Hitachi Comms. - IJKK Sales Team, 1st Sales Region

45) Baba, Yumiko

Field Sales Engineer, Mobile - IJKK Sales Team, 4th Sales Region

46) Babu, Amar

Director - Sales and Marketing Group, Asia

47) Bailey, Nive*

Business Manager, APAC Business Management Operations

48) Bailey, Tim

Country Manager, Australia/New Zealand – APAC Sales and Marketing

49) Bainbridge, John

Reseller Channel Manager, UK and Ireland

50) Baker, Robert*

Senior Vice President and General Manager - Technology and Manufacturing Group

51) Baker, Ryan W.

Manager - WW Joint Marketing Program

52) Bakkeren, Matty

Solution Specialist - Benelux Sales Organization

53) Baldi, Emanuele*

Channel Sales Manager, SEUR - EMEA Reseller Channel Operation

54) Bandukwala, Naveed

Product Marketing Engineer, Materials Division, PMO Capabilities – Technology and Manufacturing Group

55) Bar, Artur

Field Sales Application Engineer, Warsaw

55) Barazov, Oleg

Acting Russia RM

56) Barbaro, Laura

Sales, Northeast and Mid-Atlantic Territory Manager - North America Channel Sales & Marketing

57) Barrett, Carol

Director, Enterprise Marketing – Sales and Marketing Group

58) Barrett, Craig R.*

Chairman of the Board

59) Barrett, Holly*

Finance Controller – Fab/Sort Manufacturing

60) Barua, Prem

SDM Server Field Sales Engineer – Gateway

61) Bates, Michael J.*

Counsel, North America - Americas Sales and Marketing

62) Becker, Brian

Market Development Manager, North America - Dell Team Worldwide

63) Becker, Dieter

Customer Sales Analyst

64) Beckingham, Iain*

Market Development Manager – Dell Team Worldwide

65) Beckmann, Sven

Reseller Channel Manager – META Reseller Channel Operation Management Team

66) Bellamy, Sam

Director – WW Reseller Channel Operation Channel Marketing

67) Bellini, Claudio

Business Development Manager, Energy and Manufacturing

68) Benander, Eric

Sales and Marketing Manager - Semi Channel Sales and Marketing

69) Benettaib Abdelaziz

Influencer Sales

70) Bennett, Ben

Director – Servers Marketing Program

71) Benson, Roger

Country Manager - Benelux

72) Berndorfer, Andreas

Retail Marketing Manager, Retail Marketing EMEA

73) Bernhard, Christine

Market Development Manager, Amplify - France Sales and Marketing Group

74) Berthreux, Didier

Market Development Manager, France - Dell Team Worldwide

75) Bettner, John

WW Account Manager - EMS Team

76) Beutler, Russell

Business Development Manager, Germany/Austria/Switzerland

77) Bhogal, Jaspal*

Account Manager - Hewlett-Packard EMEA Account Team

78) Bieber, Mark

Customer Quality Engineer - Hewlett-Packard Account Team

79) Bielmeier, Bernd

Business Development Manager, Public Sector - Germany/Austria/Switzerland

80) Black, Tim

Market Development Manager - UK & Ireland Sales & Marketing

81) Blanch, Stuart*

Manager, Pricing and Competition Team - Product Marketing and Business Organization

82) Blanco, Julian

Field Sales Engineer - South Cone, Reseller Channel Operation, Latin America Region

83) Blankenburg, Solvig

Account Manager, Medion

84) Bliemer, Patrick*

Manager, Platform Pricing and Roadmaps - Microprocessor Marketing and Business Planning

85) Blomfield, Trish

Solutions Architect and Acting Solutions Specialist – Customer Solutions Group

86) Bohn, Christian

Reseller Channel Manager - Nordic Organization

87) Boles, Mark

Marketing Engineer Manager, SSG Support Group, Microsoft Program Office – Software Solutions Group

88) Bontemps, Monique

Market Development Manager, Lenovo

89) Borden, Mary

Revenue Management Solutions – Sales and Marketing Group

90) Bouskela, Mauricio

RM – ACSG Latin America Region

91) Bowstead, Sandra L

Rebate Analyst - Hewlett-Packard Account Team

92)	Brailey,	Mark*
<i></i>		TATOR I NE

EMEA Marketing Organization - EMEA Management Organization

93) Brandt, Jesper

Channel Field Sales Engineer, Denmark – Nordic Organization

94) Brennan, David

Market Development Manager - Americas Marketing Group

95) Brenner, Matt*

Manager, Pricing and Rebates - America's Sales and Marketing Operations

96) Brent, Rob

Market Development Manager

97) Bressler, Jennifer

Flash Marketing - Flash Products Group

98) Brewer, Kevin*

Manager, Desktop Pricing - America's Sales and Marketing Operations

99) Bris, Angeles

Field Sales Engineer, Venezuela - Northern Cone, Latin America Region

100) Bruening, Ann

FSMDM, North America Consumer Sales & Marketing - Hewlett-Packard Account Team

101) Brunaldi, Alexander

Field Sales Engineer, Bz Channel

102) Bruno, C.J.*

Director - Corporate Marketing and Development, Americas Marketing Group

103) Bryant, Andy*

Executive Vice President and Chief Financial and Services Officer

104) Bryant, Diane M.*

Vice President – Digital Enterprise Group; General Manager – Server Platforms Group

105) Bucci, Dario*

Country Manager, Italy

106) Bui, Leon

Distribution Account Manager, Australia – APAC Reseller Channel Operation Distribution

107) Bui, Tinh

Chipset Pricing - Chipset Supply and Demand Operations, Microprocessor Marketing and Business Planning

108) Bullitt, David

Former Manager, Retail Marketing Program - Retail Sales and Marketing

109) Burloiu, Irinel

Business Development Manager, Warsaw

110) Burns, Louis

Vice President;

General Manager - Digital Health Group

111) Busija, Ralf*

MND Account Manager - EMEA Reseller Channel Operation Distribution

112) Cain, Barrett*

Server Platform Manager - America's Sales and Marketing Operations

113) Camacho, Alfedo

Field Sales Engineer

114) Campos, Charlie

Director, Demand Creation Marketing

115) Canepa, Paolo

Retail Marketing Manager

116) Cantatore, Isabella

Finance - Benelux

117) Carey, Charlie

District Manager - Gateway Team

118) Carpanelli, Gian Luca

Account Manager, TSG - Hewlett-Packard EMEA Account Team

119) Carrascal, Norberto

Iberia Public Sector Manager – Influencer Sales

120) Carreon, Ricardo

Regional Manager – Latin America Region

121) Carron, Beryl

Assistant, EMEA Sales and Marketing - Sales and Marketing Group

122) Carter, Stacey

Rebate Manager – America's Sales and Marketing Operations

123) Catchpool, James*

Field Sales Engineer - Dell Team Worldwide

124) Cato, Mike H.

Market Development Manager, Germany/Austria/Switzerland

125) Cavalcante, Jamie*

Customer Business Operations Intel Architecture MNC, Internal Operations - America's Sales and Marketing Operations

126) Cepella, Otto

Field Sales Engineer, Phillips Embedded Sales - Benelux Sales Organization

127)

Geographic Lead, IBM APAC - IBM/Lenovo Sales Region

128) Chan, Ivan

Field Sales Engineer - Dell Team Worldwide

129) Chandrasekher, Anand*

Senior Vice President;

General Manager - Sales and Marketing Group

130) Chang, Edward

Field Sales Engineer, Taiwan and China - Hewlett-Packard Account Team

131) Chapman

Geographic Lead IBM EMEA - IBM/Lenovo Sales Region

132) Chase, Steve

President - Intel Russia

133) Chattin, Kathleen

Director – WW Corporate Marketing Research

134) Chee, Kit Ho

Controller, Channel Platform Group - Platform Finance

135) Cheffer, Chris*

Retail Sales Manager - Americas Sales and Marketing Organization

136) Chen, Jason LS

Country Manager, Taiwan

137) Chen, Jason

Former Vice President - Sales and Marketing Group

138) Chen, Jian

Manager - Customer Solutions Group, China/Hong Kong

139) Chen, Julia

Market Development Manager, PRC - Worldwide Sony Sales and Program Office

140) Chen, Michael

Director, APAC Communications and Marketing – APAC Sales and Marketing

141) Chen, Mung*

Manager, New Technology Planning – Technology Strategy

142) Cheng, Eric

Area Sales Manager, Hong Kong - APAC Reseller Channel Operation

143) Cheon, Kaiser

Manager - Customer Solutions Group, China/Hong Kong

144) Cheung, Helen

Field Sales Engineer

145) Chew, Sophia*

Vice President – Sales and Marketing Group;

General Manager - Reseller Channel Operation

146)	Chiavegati, Stefano
	Intel Inside, TSG - Hewlett-Packard EMEA Account Team

- 147) Chien, Susan
 Area Sales Manager, Taiwan APAC Reseller Channel Operation
- 148) Chiu, Debbie*
 Channel Marketing Manager APAC Reseller Channel Operation
- 149) Choong, Peter
 Country Manager, SEA APAC Sales and Marketing
- 150) Christensen, Steven Channel Field Sales Engineer, Norway – Nordic Organization
- 151) Christl, Arnd*
 Consumer Manager, Germany/Austria/Switzerland
- 152) Chu Thi Hoang, Mai Channel Field Sales Engineer – France Sales and Marketing Group
- 153) Chua, Vincent Geographic Sales, APAC – IBM Sales Region
- 154) Cintra, Pedro
 Business Development Manager
- 155) Cintra, Pierre
 Regional Manager, Enterprise Business Group
- 156) Claassen, Dirk Account Manager, Toshiba
- 157) Clark, Jeff*
 Regional Manager European Union Region
- 158) Clark, Jeff R.*
 Retail Marketing Program Manager Americas Sales and Marketing
- 159) Clarke, Oscar Country Manager, Brazil
- 160) Clary, Eileen Field Sales Engineer – Lenovo Sales Region
- 161) Clerencia, Carlos
 Regional Distribution Sales Manager EMEA Reseller Channel Operation Distribution
- 162) Clinkenbeard, Joel Director, Compiler Lab
- 163) Cnossen, Greg
 Field Sales Engineer Lenovo Sales Region
- 164) Conn, Steve*
 Account Manager, Consumer Client Group Hewlett-Packard Account Team
- (*) Denotes "Party-Designated Production Custodian"

165) Conrad, Deborah*

Vice President – Sales and Marketing Group;

Director - Team Apple

166) Constant, Chad*

Account Manager, Ent Client Group - Hewlett-Packard Account Team

167) Cook, Angus

Distribution Business Manager - Benelux Sales Organization

168) Cooper, Doug

Country Manager, Canada - Americas Marketing Group

169) Corbett, Kevin*

Vice President – Digital Home Group;

General Manager - Content Services Group

170) Cordova, Jorge

Account Manager, Infinity

171) Corell, Roger J

Chipset and Software Marketing

172) Corio, Esteban

Manager, Southern Cone - Reseller Channel Operation, Latin America Region

173) Correia, Tara

Retail Marketing Program Manager - Retail Sales and Marketing

174) Couadou, Fabrice

Marketing Manager - Digital Health

175) Crepps, Robert

Technical Market Engineer

176) Criddle, Adrian*

Account Manager - IBM/Lenovo Europe; Former Retail Consumer Manager, United Kingdom

177) Crist, Scott

Business Communications Manager - Sales and Marketing Group

178) Crooke, Robert B.

Vice President and General Manager – Business Client Group

179) Cruickshank, Ken

Marketing Manager - WW Retail Channel Operations

180) Culbertson, Leslie*

Vice President - Director of Finance

181) Curran, Richard

Director - Customer Solutions Group, EMEA

182) Cyphert, Tammy*

Director of Operations - Americas Sales and Marketing

183) D'Amico, Mike

Retail Marketing Manager, Office Depot - Retail Sales and Marketing

184) Dachepalli, Bhasker

Technical Marketing Engineer; Field Application Engineer

185) Dallas-Conte, Nigel

Channel Sales Manager, Russia/CIS - EMEA Reseller Channel Operation

186) Dallman, Steve*

Director, North American Distribution and Channel Marketing

187) Daubitz, Bettina

Lead Market Development Manager, Medion

188) Davies, John

Vice President – Sales and Marketing Group; General Manager – Customer Solutions Group

189) Davies, Mel

Manager, Greater Asia Region Logistics

190) Davis, Boyd*

General Manager, Intel Server Platforms Group Marketing - Digital Enterprise Group

191) Davison, Nick*

Former Manager - Worldwide Retail Sales and Marketing

192) Day, Nicholas

Manager, Demand Forecasting - IA Supply and Demand Operations

193) de Buck, Kurt

Market Development Manager – Benelux Sales Organization

194) De Grazia, Adrian

Bz Channel Manager - Reseller Channel Operation, Latin America Region

195) de la Gastine, Helene

Field Sales Engineer, EMEA - Hewlett-Packard Account Team

196) De la Horie, Tanguy*

MND Account Manager – EMEA Reseller Channel Operation Distribution

197) de Ruiter, Piet

Account Manager, Philips CE - Benelux Sales Organization

198) Dean, Eric

CSO Disti Channel

199) Dean, Patti

Customer Business Analyst - Dell Team Worldwide

200) **DeKlotz, Wesley**

Mobile Platform Marketing, Product Platform Marketing Group - APAC Sales and Marketing

201) DeLine, Rob

Director, Mobility Brand Management - Sales and Marketing Group

202) Derache, Stijn

Market Development Manager; Strategic Relations Manager - Benelux Sales Organization

203) Dickstein, Keith

DCBM Organization - Paracon, Cygom

204) Divis, Franziska

IIP Account Relationship Manager, Marketing Specialist

205) Dognaux, Pascal

Global Account Manager, Phillips – Benelux Sales Organization

206) Dollfus, Marc

Business Development Manager, Education/Research - France Sales and Marketing Group

207) Domarkas, Ramunas

Channel Field Sales Engineer

208) Donnelly, Tom*

WW Account Manager - IBM Sales Region

209) Dorchak, Glenda

Vice President – Sales and Marketing Group; General Manager – Digital TV Brand Management

210) Doyle, Christine

Finance Manager - Microprocessor Marketing and Business Planning

211) Dracott, Richard*

Director, End User Strategic Marketing, End User Platform Initiative Group - Digital Enterprises Group

212) Drdul, Martin

MNC Market Development Manager

213) Dressler, Britt

IIP Account Relationship Manager, Marketing Specialist

214) Dua, Anuj

Marketing Manager, Platform Competitive Marketing – Microprocessor Marketing and Business Planning

215) Dubey, Shobhit

Geographic Sales, APAC - IBM Sales Region

216) Dubreuil, Jean-Marc*

Director - Product Marketing and Business Operations, EMEA

217) Dumke, Paul

Field Sales Engineer - Toshiba Team

218) Dunford, Matt

WW Client Benchmarking Manager - Microprocessor Marketing and Business Planning

219) Duong, Peter

CSO Tier / MNC - America's Sales and Marketing Operations

220)	Dwyer, Rick Manager, Customer Solutions Group – Americas Sales and Marketing Operations
221)	Ebert, Heinz Channel Field Sales Engineer, Germany/Austria/Switzerland
222)	Eby, Elizabeth* Director – Finance and Administration, Asia Pacific
223)	Eda, Makiko* General Manager – IJKK Marketing HQ
224)	Eden, Shmuel (Mooly) Vice President and General Manager – Mobile Platforms Group
225)	Edwards, Carole* Manager, Intel Architecture Supply Chain Strategic Program
226)	Edwards, Jim W. Systems and Platform Architect – DHG
227)	Eid, Henning* Market Development Manager, Consumer/Digital Home, Germany/Austria/Switzerland
228)	Eisa, Michael Business Development Manager, Finance – France Sales and Marketing Group
229)	Ekenberg, Christian Market Development Manager – Nordic Organization
230)	El Fateh, Karim Business Development Manager – Influencer Sales
231)	El-Dardiry, Ahmad Market Development Manager – Dell Team Worldwide
232)	Elemans, Martinus Enterprises and Services Manager – Benelux Sales Organization
233)	Ella, Johanna Channel Field Sales Engineer, Finland – Nordic Organization
234)	Emma, Rita Divisional Planning Manager – Customer Fulfillment Planning and Logistics Group
235)	Enaya, Tarig Business Development Manager – Influencer Sales
236)	Endicott, Anne Mieke Channel Field Sales Engineer, Broad Channel Biz Manager – Benelux Sales Organization
237)	Ereren, Burak Market Development Manager – UK and Ireland Sales and Marketing

(*) Denotes "Party-Designated Production Custodian"

Ernst, Greg

Market Development Manager - Dell Team Worldwide

238)

239)	Esdourubail, Fabien Market Development Manager, France – Dell Team Worldwide
240)	Eshaghoff, Eric* Server Platform Marketing Manager
241)	Espinosa, Roberto Reseller Channel Manager, Iberia
242)	Esque, Shelly Director – Corporate Public Affairs
243)	Fahey, Patrick Data Manager – IA Supply and Demand Operations
244)	Fahey, Paul Director, Memory Enabling – Platform Memory Operations
245)	Fahmy, Karim Country Manager, Egypt Levant and North Africa
246)	Farrell, Tim* Manager, Server Platform Marketing – Americas Marketing Group
247)	Fenwick, David Server Platform Architecture and Planning
248)	Ferdane, Isabelle Marketing Manager – France Sales and Marketing Group
249)	Ferraro, Tony* CSG/GTW Business Manager – Gateway
250)	Ferrero, Juan Pablo Business Development Manager, Iberia
251)	Finger, Joerg* Account Manager – Fujitsu-Siemens; Former Director, Solutions and Marketing – EMEA
252)	Fingerhut, Steve* Account Manager, Entertainment Infrastructure Group – Hewlett-Packard Account Team
253)	Finley, Terence* Account Manager, Americas Sales Engagement – Hewlett-Packard Account Team
254)	Fleck, Jamey Market Development Manager – Dell Team Worldwide
255)	Fleig, Helmut Marketing, Australia/New Zealand – Dell Team Worldwide

256) Fletcher, Paul

Controller - SMD WW Marketing

257) Flory, Isabelle*

MND Account Manager – EMEA Reseller Channel Operation Distribution

^(*) Denotes "Party-Designated Production Custodian"

258)	Foo,	Claudia	
		~	

Manager, Brand Strategy

259) Foote, Deanna

Field Sales Engineer - Dell Team Worldwide

260) Forero, Jaime

Distribution Business Manager, Spain and Portugal (Iberia)

261) Fortunati, Enrica

PR and Branding Manager, Italy and Greece

262) Foster, Andrew

Product Marketing Analyst - Product Marketing and Business Organization

263) Fox, Eric

Finance – Advanced Components Division

264) Francis, Richard

Strategic Relations Manager - UK and Ireland Sales and Marketing

265) Franklin, Ruth

Senior Attorney, Americas Counsel - Sales and Marketing Group

266) Franz, Tom*

Vice President and General Manager - Fab/Sort Manufacturing

267) Fravel, Brian G.

Manager, Consumer Desktop Marketing

268) French, Mike

Manager, Internet Marketing and Biz Solutions

269) Frick, David

Field Sales Engineer, Communications - Hewlett-Packard Account Team

270) Frieda, Jen

Retail Marketing Manager, Comp USA

271) Friedman, Mark*

Director - WW Sales Legal

272) Frieswyk, Mike*

Co-General Manager, Customer Solutions Group - Sales and Marketing Group

273) Frutiger, Donna

Distribution Marketing Manager – North America Channel eMarketing/Operations

274) Fuchs, Philippe

OEM Co-Marketing Manager

275) Fujii, Keiko

Customer Business Analyst – IJKK Operations

276) Fujiki, Takako

Senior eBusiness Consultant, Customer Supply Chain and BPR Group - IJKK Operations

277)	Fukuda, Noboru Channel Field Sales Engineer, Disti – IJKK Sales Team, 6th Sales Region
278)	Furr, Larry

Retail Marketing Manager, Circuit City - Retail Sales and Marketing

- 279) **Furukawa, Junichi**Marketing Analyst, Business Management Team IJKK Operations
- 280) Furuyama, Kazunori Field Sales Engineer Embedded and Communication IJKK Sales Team, 1st Sales Region
- 281) Gacsal, Jozsef
 Business Development Manager, Budapest
- 282) Gale, Julian
 Strategic Relations Manager UK and Ireland Sales and Management
- 283) Gallagher, Bob
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- 284) Ganas, Daryl*
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- 285) Gandhi, Sharad Manager –Digital Health Platform, EMEA
- 286) Ganesh, Sudha
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- 287) Gargini, Paolo*
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- 288) Garrison, Tom
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- 289) Garza, Tony
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- 291) Gelsinger, Pat*
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- 292) Genzken, Heiner Account Manager, MaxData
- 293) **Geroy, April**Pricing Manager, Latin America Region America's Sales and Marketing Operations
- 294) Gill, Tom
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- 295) Gillard, Patrick IBM Bid Team

296) Gillespie, Greg	
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297) Gillich, Stephan High Performance Computing Competitive Analyst

298) Girard, Etienne North America Credit Manager – Treasury US Credit

299) Glaser, Shelagh* Controller – Sales and Marketing Group

300) Gleissner, Peter* Account Manager, Dell – EMEA

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303) Golubeff, Robert Site Manager, RCM South, Budapest

304) Goncalves, Marcelo A. Field Sales Engineer, Bz Channel – Reseller Channel Operation, Latin America Region

305) Gong, Lloyd Business Analyst - Channel Product Line Group; Former CPU Direct/Distribution Price Analyst - Microprocessor Marketing and Business Planning

306) Gonzalez, Brian Manager, Enterprise and Services – Benelux Sales Organization

307) **Gonzalez, Dave**Marketing Manager, Latin America Region

308) Gonzalez, Felipe Field Sales Engineer, Mexico DF Channel

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311) **Graff, Lisa**General Manager – Server Platform Group

312) **Granovski, Gregory**IIP Manager, EMEA TEG – IJKK Sales Team, 4th Sales Region

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314) Grant, Steve*

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315) Grattoni, Gerald

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316) Graylish, Gordon*

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318) Green, Neil*

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319) Green, Zennan

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322) Grilli, Carlo

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323) Grove, Andrew S.

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328) Haedrich, M.

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330) Halbert, John B.

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332) Hamilton, Brian*

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333) Hamilton, David

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334) Han, Michael

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335) Haneda, Hirofumi

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336) Hanna, John

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339) Harder, Cam

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340) Harries, Rachel

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342) Harris, Lesley

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347) Hashino, Setsuko

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350) Hays, Robert C

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354) Herrman, Rick

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355) Hinthorne, Mary

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356) Hite, David

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357) Ho, Edward*

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358) Hodakowski, Tomasz

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359) Hoefflinger, Mike

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361) Hogg, Chris

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363) Holmes, Allen*

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369) Houet, Chris

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370) Howard, Steve

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371) Hsu, Adam

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372) Huang, Dustin

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374) Hubbard, Stephanie

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375) Hunter, Steven*

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376) Hurst, Lawrence G.

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377) **Hyman, Jeff**

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378) Ichikawa, Kazuko

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381) Ikai, Ayumu

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382) Ikeda, Akimori

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383) Ikeda, Hiroshi

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384) Ildeniz, Aysegul

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386)	Inoue, Tooru Account Manager, Fujitsu Network – IJKK Sales Team, 2nd Sales Region
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388)	Ishida, Shin Field Sales Engineer – IJKK Sales Team, 7th Sales Region
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394)	Janosczyk, Frank Account Manager, MaxData
395)	Janssens, Guy Reseller Channel Manager – Benelux Sales Organization
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399)	Jimenez, Ignacio Consumer Market Development Manager, Spain
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401)	Johnson, Keith D. Customer Relationship Manager, EMS Team
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419) Kavanagh, Jim N.

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422) Kawamura, Tokiko

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425) Keating, Ann*

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428) Kempner, Abigail

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429) Kershaw, Gary

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431) Khanna, Sanjeev

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441) Kim, Tetsuya

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463) Krigger, Rich

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469) Kubo, Atsushi

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473) Kumar, GB

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474) Kunerth, Ernst*

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488) Laney, Clifton

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489) Lang, Jorge

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492) Larsen, Rick

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495) Lauwereins, Sally

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496) LeBlanc, Gary

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497) Lee, Allen

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498) Lee, H.S.

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499) Lee, Linda

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501) Lee, Randy

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502) Lefree, Shelly

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514) Lim, Pete

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515)	Lim, Tony CK
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537) Liu, Yue (David)

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539) Luque, Alberto

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574) Matushima, Toshiya

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576) Maximoff, Jesus

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583) McCurdy, Ryan

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584) McDermott, Lance

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585) McGee, Kevin

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586) McGowan, John

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598) Merli, Romeo
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612) Mitchell, Debbi

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614) Mlejnek, Miroslav

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615) Monroy, Jose

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632) Mulloy, Chuck

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633) Munakata, Yoshie*

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634) Munguia, Terry

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635) Muranaka, Hiromi

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